



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CK:TK
F.#2010R00420

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 29, 2012

BY HAND and ECF

Susan R. Necheles, Esq.
Hafetz Necheles & Rocco
500 Fifth Avenue
29th Floor
New York, NY 10110

Russell M. Gioiella, Esq.
140 Broadway
38th Floor
New York, New York 10005

Re: United States v. Pedro Espada Jr., et al.
Criminal Docket No. 10-985 (S-2) (FB)

Dear Counsel:

This letter serves to document for the record the government's supplementation of its Rule 16(a)(1)(G) expert disclosure on February 22, 2012 through the production of a report and materials concerning the testimony of William Riordan, a previously-noticed expert who conducted the handwriting analysis connected with this case.

As the material previously provided to you makes clear (including charts prepared by Mr. Riordan), Mr. Riordan will testify that Pedro Espada, Jr. wrote the statements identified in Government Exhibits 408, 408(a) and 408(b), and that there is a substantial probability that he wrote the words "Staff Gift Certificate" found in Government Exhibit 68.

If you have any further questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Carolyn Pokorny
Roger Burlingame
Todd Kaminsky
Assistant U.S. Attorneys

Enclosures

cc: Clerk of Court (FB) (w/o enclosures)